

# **Exhibit 4**

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

SKAT,

Plaintiff,

vs.

THE RANDOM HOLDINGS 401K PLAN  
& ROBERT KLUGMAN,

Defendants.

Civil Action No. 3:18-cv-00758-CSH

Honorable Charles S. Haight, Jr.

July 30, 2018

**PLAINTIFF'S UNOPPOSED MOTION  
FOR ENLARGEMENT OF TIME TO  
SERVE PROCESS**

Plaintiff SKAT respectfully moves this Court, pursuant to Fed. R. Civ. P. 6(b) and D. Conn. L.R. 7(b), for an enlargement of the time to serve process on Defendant The Random Holdings 401K Plan (“**Random Holdings**”) for an additional 90 days beyond the 90 days from the date the Complaint was filed. Despite SKAT’s diligent efforts it has not yet been able to effect service of process on Defendant Random Holdings. In support of this Motion, Plaintiff states that:

1. This action was filed in this Court on May 4, 2018. Pursuant to Fed. R. Civ. P. 4(m), the original date by which Plaintiff must serve process on Defendant is August 2, 2018.
2. Plaintiff made efforts to personally serve Defendant Random Holdings by means of a process server from Target Research & Investigation, who unsuccessfully attempted to effect service at Defendant Random Holdings’ address, 200 Henry Street, Apartment 101, Stamford, CT 06902.

3. Plaintiff also sought to serve Defendant Random Holdings by requesting that counsel for Defendant Robert Klugman (“**Klugman**”), David L. Goldberg of Katten Muchin Rosenman LLP, accept service on behalf of Defendant Random Holdings. As alleged in the Complaint, Defendant Klugman has previously described himself as the “Authorized Representative” of Defendant Random Holdings. Mr. Goldberg represented to SKAT’s counsel that Defendant Random Holdings no longer exists and therefore, he was unable to accept service on behalf of Defendant Random Holdings. Mr. Goldberg also represented that he is unaware of any other individual or entity authorized to accept service on behalf of Defendant Random Holdings. Mr. Goldberg authorized SKAT’s counsel to represent that Defendant Klugman does not oppose this Motion.
4. Plaintiff is seeking additional information to determine the current legal status and location of Defendant Random Holdings, both from Defendant Klugman’s counsel as well as other sources.
5. This Motion is the first request by Plaintiff for an enlargement of time to serve process on Defendant Random Holdings.
6. Pursuant to Fed. R. Civ. P. 4(m), this Motion is brought in good faith and not for the purpose of delay, and good cause exists to allow the additional time requested.
7. The time in which Plaintiff has to serve process on Defendant Random Holdings has not expired, and this Motion is filed within this Court’s deadline to seek extension of time, pursuant to L.R. 7(b)(3).

**WHEREFORE** the Plaintiff respectfully requests that this Court enter an Order enlarging by an additional ninety (90) days, until October 31, 2018, the period of time in which the Plaintiff may effect service of the Complaint (Docket Entry No. (“**D.E.**”) 1); Summons (D.E. 7); Order on Pretrial Deadlines (D.E. 2); Electronic Filing Order (D.E. 3); Standing Protective Order (D.E. 4); and Order Re: Disclosure Statement (D.E. 5) on Defendant Random Holdings as set forth above.

DATED this 30th day of July, 2018.

Respectfully submitted,

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